

King County Auditor's Office

Kymber Waltmunson, King County Auditor



King County

DATE: February 10, 2016

TO: Metropolitan King County Councilmembers

FROM: Kymber Waltmunson, King County Auditor

SUBJECT: Follow-up on Opportunities to Improve Family and Medical Leave Administration

The County Executive and the Human Resources Division (HRD) have made progress in addressing all seven of our audit recommendations, resulting in new legislation that aligns federal and King County family and medical leave. Additional actions are needed, however, to fully implement recommendations on providing policies, training, and guidance to employees impacted by the change in the law.

Of the seven audit recommendations:

| | | |
|----------|---|--|
| DONE | 1 | Recommendation has been fully implemented Auditor will no longer monitor |
| PROGRESS | 6 | Recommendations are in progress or partially implemented Auditor will continue to monitor |
| OPEN | 0 | Recommendations remain unresolved Auditor will continue to monitor |

Please see below for details on the implementation status of these recommendations.

Implementation Status as of February 2016

| # | Quick Status | Recommendation | Status Detail |
|---|--------------|--|--|
| 1 | DONE | The County Executive should continue the work it has initiated to develop a proposed ordinance that aligns FMLA and KCFML as a single category of family and medical leave. | <p>The King County Coalition of Unions, Office of Labor Relations, and HRD jointly prepared a draft ordinance that aligns Federal Family and Medical Leave Act (FMLA) and King County Family and Medical Leave (KCFML) as a single category of family and medical leave. The concurrency ordinance was transmitted to County Council in November 2015 and passed in December 2015. At present, only about half of King County employees are covered by the ordinance (non-represented employees and employees represented by a union participating in coalition bargaining). The Office of Labor Relations is currently in discussions with other unions and hopes more will sign-on prior to implementation.</p> <p>Implementation of this ordinance should result in efficiencies and improved accuracy in calculating and administering family and medical leave.</p> |
| 2 | PROGRESS | The County Executive should conduct and document an assessment of impacts to employees that may result from the proposed policy change and determine whether action should be taken to address any identified impacts. | <p>The County Executive completed an impact assessment in the second quarter 2015. The County Executive concluded that proposed changes under the FMLA/KCFML concurrency ordinance would be minimal, directly impacting less than one percent (0.8%) of King County employees.</p> <p>To fully implement this recommendation, the County Executive should prepare detailed guidance for impacted employees.</p> |

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| 3 | PROGRESS | The County Executive should conduct a thorough gap analysis to identify areas where additional oversight of leave administration across county departments and divisions would be beneficial and designate process owners to fill any identified gaps in oversight and accountability. | <p>The County Executive completed an initial gap analysis in the second quarter 2015. This analysis recommended a thorough examination of the county's many side systems to ensure that payroll process and time reporting codes are accurately mapped to PeopleSoft. It also recommended that the County Executive should designate an agency or department with formal oversight of the leave administration process, leave administrators, and the creation of leave administration policies.</p> <p>To fully implement this recommendation, the County Executive should complete the steps recommended in the initial gap analysis.</p> |
| 4 | PROGRESS | The Human Resources Division and Benefits, Payroll, and Retirement Operations Section should develop comprehensive training and ensure that supervisors are trained at least annually on policies and procedures that relate to family and medical leave management and time approval. | <p>Training to address overall education of family and medical leaves to King County leave administrators, human resources staff, and supervisors was provided in February and October 2015. Training to address changes under the FMLA/KCFML concurrency ordinance is scheduled before the end of the second quarter 2016 and annually thereafter.</p> <p>To fully implement this recommendation, HRD should conduct the scheduled trainings each year.</p> |
| 5 | PROGRESS | The Human Resources Division should formalize a clear mechanism and process owner(s) for the documentation, communication, and implementation of county policy and best practices in leave administration across county departments and divisions. | <p>HRD and Benefits, Payroll, and Retirement Operations Section (BPROS) are jointly developing revised leave administration policies and guidelines.</p> <p>To fully implement this recommendation, HRD should complete and formalize the administration policies and guidelines, including designating process owners for county departments and divisions.</p> |

| # | Quick Status | Recommendation | Status Detail |
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| 6 | PROGRESS | <p>The Department of Executive Services should develop a plan to facilitate accurate and complete entry of leave time, including mechanisms to:</p> <ol style="list-style-type: none"> Reduce the complexity of time reporting codes on employee time logs. Alert supervisors and/or timekeepers to check for family and medical leave status at specific intervals of reported family and medical leave use. Train employees on proper time reporting. | <p>The Department of Executive Services (DES) has made progress on this recommendation:</p> <ol style="list-style-type: none"> Efforts to streamline coding for family and medical leave within the PeopleSoft system will be part of HRD's 2016 work plan. A significant challenge will be that the FMLA/KCFML concurrency ordinance is only applicable to approximately half of the county's workforce, resulting in the potential need to administer two leave administration processes with separate time reporting codes. HRD and BPROS jointly developed a private PeopleSoft query for agencies to track their employees' usage of family and medical leave. The query is being rolled out to agencies on a staggered schedule due to customizations needed for each agency. The query is tentatively scheduled to be implemented in all agencies in 2016. Training will be provided in second quarter 2016 to county leave administrators, payroll, and human resource staff on appropriately entering time reporting codes. This training will be a part of the overall leave administration training needs established in the FMLA/KCFML audit report. HRD expects that agency staff would then be able to train its employees who use self-entry time to use the appropriate leave time reporting codes while on family and medical leaves. <p>To fully implement this recommendation, DES should finish streamlining the complexity of reporting codes, rolling out the query, and ensure that employees are being appropriately trained on proper time reporting.</p> |

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| 7 | PROGRESS | The County Executive should develop policies clarifying that accurate time entry is a performance expectation for employees and supervisors. | <p>HRD, with the support of the King County Executive Office and the Office of Labor Relations, is planning to develop a policy on accurate time entry as a performance expectation for both employees and supervisors. This policy is anticipated to be disseminated around the same time as the training for FMLA/KCFML concurrency before the end of the second quarter 2016.</p> <p>To fully implement this recommendation, the County Executive should formalize the policy, currently under development, when complete.</p> |

Justin Anderson and Peter Heineccius, Senior Management Auditors, conducted this review. Kymber Waltmunson, King County Auditor, was the project supervisor. Please contact Peter at 206-477-0077 if you have any questions about the issues discussed in this letter.

cc: Dow Constantine, King County Executive
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